

For Six Month Period Ending

13 MAR 1992

(Insert date)

Name of Registrant

Sidley & Austin

Registration No.

3731

Business Address of Registrant

1 First Nat'l Plaza 1722 Eye St., N.W.
Chicago, IL 60603 Washington, D.C. 20006

875 3rd Ave.
New York, NY 10022

2049 Century Park East
Los Angeles, CA 90067

I-REGISTRANT

633 W. 5th St. Suite 3500
Los Angeles, CA 90071

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name

Position

See Attachment A

Date Connection
Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☒ No ☐

If yes, furnish the following information:

See Attachment B

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☒ No ☐

If yes, identify each such person and describe his services.

Robert R. Wootton. As a partner, Mr. Wootton has rendered legal services to The Manufacturers Life Insurance Company, a foreign principal.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
Robert B. Shanks	Partner	10/15/91

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II--FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

The registrant terminated its FARA registration with respect to the following:

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date of Termination</i>
Government of El Salvador	12/23/91
Republic of Korea	12/23/91
Pohang Iron and Steel Company	12/23/91

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

<i>Name and address of foreign principal</i>	<i>Date acquired</i>
The Manufacturers Life Insurance Company 200 Bloor Street East Toronto Ontario, Canada M4W 1E5	3/9/92

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Government of the Cayman Islands
Moscow Narodny Bank

III--ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment C

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment D

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment E

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
See Attachment F			

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
11/91	\$500	Clinton for President (from Joseph B. Tompkins)	Bill Clinton
11/91	\$100	Citizens for Harkin (from Linda Mar)	Tom Harkin
2/24/92	\$1000	Clinton for President (from J. Tompkins)	Bill Clinton

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- ☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐
 Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represent during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Joseph B. Tompkins, Jr.
Joseph B. Tompkins, Jr.

Subscribed and sworn to before me at 1722 F Street, N.W.

this 14th day of April, 1992

[Signature]
(Signature of notary or other officer)

My Commission Expires November 30, 1995

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CRM-154, formerly Form OBD-64 - Supplemental Statement):

Yes _____ or No X _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No X _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Joseph B. Tompkins
Signature

4/14/92
Date

Joseph B. Tompkins.
Please type or print name of
signatory on the line above

Partner

Title

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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ATTACHMENT A3. Persons Ceasing to be Partners of Registrant,
September 14, 1991 - March 13, 1992

<u>Name</u>	<u>Position</u>	<u>Date</u>
Robert B. Shanks	Partner	10/15/91
Kenneth K. Howell	Partner	11/4/91
Charles E. Lomax	Partner	12/31/91
Hugh C. Gardner III	Partner	12/31/91
Harry T. Bauman	Partner	12/31/91
Franklin A. Chanen	Partner	12/31/91
Chester Maciorowski	Partner	1/8/92
Tom W. Davidson	Partner	2/1/92
Margaret L. Tobey	Partner	2/1/92
Michael S. Yauch	Partner	2/10/92

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ATTACHMENT B

4. Persons Becoming Partners of Registrant,
September 14, 1991 - March 13, 1992

<u>Name</u>	<u>Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date</u> <u>Assumed</u>
Robert R. Wootton	3272 Aberfoyle Place, NW	U.S.A.	Partner	10/1/91

ATTACHMENT C

11. Activities by Registrant for Foreign Principals,
September 14, 1991 - March 13, 1992

The Government of the Cayman Islands

The registrant has provided legal counsel to the Government of the Cayman Islands concerning several legal proceedings in the United States and requests for assistance in connection with certain proceedings. The registrant has also reviewed legislation and regulations and provided legal advice to the Cayman government with respect to those matters.

In the course of these activities, employees of the registrant have communicated with officials and employees of the U.S. government. Such communications have consisted of court filings before the U.S. Court of Appeals for the Seventh Circuit; inquiries regarding and telephone requests for legislation, regulations, public reports, hearing transcripts and court filings; and communications and meetings with employees of the Office of International Affairs, Criminal Division, U.S. Department of Justice, as discussed in response to question 12 of this statement.

The Government of El Salvador:

The registrant has provided legal services to the Government of El Salvador in connection with refinancing its foreign military sales debt owed to the United States. The registrant assisted the Government of El Salvador in negotiating the terms of the refinancing with representatives of the U.S. Departments of Defense, State and Treasury and the Office of Management and Budget, and also contacted representatives of the Securities and Exchange Commission. In addition, the registrant drafted corporate legal documents necessary to accomplish the refinancing. The registrant's representation of the Government of El Salvador did not involve political activities. The registrant terminated its registration on behalf of The Government of El Salvador on December 23, 1991.

Republic of Korea:

The registrant provided no legal services to the Republic of Korea during the six-month period covered by this statement. The registrant terminated its registration on behalf of the Republic of Korea on December 23, 1991.

Attachment C, page 2

Manufacturers Life Insurance Company:

The registrant has provided legal counsel to the Manufacturers Life Insurance Company regarding U.S. tax laws and has represented the company's views regarding the application and possible amendment of the provisions of the Internal Revenue Code governing the taxation of foreign insurance companies, particularly Section 842(b) of the Code.

Moscow Narodny Bank Ltd:

The registrant has provided legal counsel to the Moscow Narodny Bank concerning the unblocking of its assets that are frozen in the United States. The registrant's representation of Moscow Narodny Bank has occasionally involved registrable activities as discussed in response to question 12 of this statement.

Pohang Iron & Steel:

The registrant has provided legal counsel in the areas of international trade and steel-related matters for Pohang Iron & Steel. The registrant's advice to Pohang Iron & Steel during the six-month period covered by this statement did not involve political activities. The registrant terminated its registration on behalf of Pohang Iron & Steel on December 23, 1991.

ATTACHMENT D

12. Registrant's Political Activities on Behalf of Foreign Principals
September 14, 1991 - March 13, 1992

The Government of the Cayman Islands:

The registrant has provided legal counsel to the Government of the Cayman Islands concerning several legal proceedings in the United States and requests for assistance in connection with certain proceedings. During the six-month period covered by this supplemental statement, partners and employees of registrant have had telephone conversations and meetings and have exchanged correspondence with: George Proctor, Director, Office of International Affairs ("OIA"), Criminal Division, U.S. Department of Justice; John Harris, OIA; and Linda Candler, OIA.

Manufacturers Life Insurance Company:

The registrant has provided legal counsel to the Manufacturers Life Insurance Company regarding U.S. tax laws and has represented the company's views regarding the application and possible amendment of the provisions of the Internal Revenue Code governing the taxation of foreign insurance companies, particularly Section 842(b) of the Code. In the course of these activities, partners of the registrant have had telephone conversations and/or meetings with: U.S. Senator Donald Riegle; David Kravitz and other members of Senator Riegle's staff; and members of the staff of the House Ways and Means Committee.

Moscow Narodny Bank Ltd:

The registrant has provided legal counsel to Moscow Narodny Bank with respect to certain of its bank accounts that are frozen in the United States. During the six-month period covered by this supplemental statement, partners and employees of the registrant have had telephone conversations and meetings and have exchanged correspondence with the following U.S. government employees: Loren Dohm, Chief of Blocked Assets, Office of Foreign Assets Control, U.S. Department of the Treasury ("OFAC"); R. Richard Newcomb, Director, OFAC; Serena Moe, Counsel, OFAC; Dennis Williams, Assets Compliance Officer, OFAC; Michael Young, Deputy Undersecretary of State for Economic Affairs and his staff; Frank Bay, Deputy Legal Advisor, Dept. of State; Steven Farrar, Deputy Assistant to the President for Domestic Policy; and John Hauge, Deputy Asst. Secretary of Treasury for the former Soviet Union and his staff.

ATTACHMENT E

14(a). Receipt of Monies
 September 14, 1991 - March 13, 1992

The Government of the Cayman Islands

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
12/12/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$53,564.97
3/11/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$56,150.22

The Government of El Salvador

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
12/11/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$115,000.00
1/21/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$ 19,796.28
1/13/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$ 258.47

Republic of Korea

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
3/25/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$10,000.00

Attachment E, page 2

Moscow Narodny Bank Ltd.

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/29/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$22,274.37
11/4/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$10,839.57
11/30/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$51,218.12
2/20/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$15,948.97

Pohang Iron & Steel Company

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
10/01/91	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$40,000.00
1/21/92	For professional services rendered in connection with legal proceedings in the U.S. and related matters.	\$20,000.00

ATTACHMENT F15. (a) Disbursements Made on Behalf of Foreign Principals
September 14, 1991 - March 13, 1992The Government of the Cayman Islands

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/14/91- 3/13/92	Postage, telephone, telex, messenger service, photocopying and document processing and travel.	\$ <u>6,456.92</u>

The Government of El Salvador

All monies expended by registrant in connection with its activities on behalf of The Government of El Salvador during the relevant time period were in connection with non-registrable activities.

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/14/91- 3/13/92	Postage, telephone, telex, messenger service, photocopying and document processing and travel.	\$ <u>10,736.91</u>

Republic of Korea

No monies were expended by registrant in connection with its representation of Republic of Korea during the relevant six-month period.

Manufacturers Life Insurance Company

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/14/91- 3/13/92	Postage, telephone, telex, messenger service, photocopying and document processing and travel.	\$ <u>72.20</u>

Attachment F, page 2

Moscow Narodny Bank Ltd.

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/14/91- 3/13/92	Postage, telephone, telex, messenger service, photocopying and document processing and travel.	<u>\$ 6,402.30</u>

Pohang Iron and Steel Company (POSCO):

All monies expended by registrant in connection with its activities on behalf of Pohang Iron and Steel Company (POSCO) during the relevant time period were in connection with non-registrable activities.

<u>Date</u>	<u>Purpose</u>	<u>Amount</u>
9/14/91- 3/13/92	Postage, telephone, telex, messenger service, photocopying and document processing and travel.	<u>\$ 1,396.10</u>